

1 JAMES T. HANNINK (131747)
jhannink@sdlaw.com
2 ZACH P. DOSTART (255071)
zdostart@sdlaw.com
3 DOSTART HANNINK & COVENEY LLP
4180 La Jolla Village Drive, Suite 530
4 La Jolla, California 92037-1474
Tel: 858-623-4200
5 Fax: 858-623-4299

6 Attorneys for Plaintiffs

7
8 UNITED STATES DISTRICT COURT
9 SOUTHERN DISTRICT OF CALIFORNIA
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11 JOHN KERR, EDWARD LI, TIM
BARNARD, KENNETH CURTIS, LIA
12 JOHNSON, JOHN ABJANIC, and
13 ARNOLD CARES, individually and on
behalf of all others similarly situated,

14 Plaintiffs,

15 vs.

16 ZACKS INVESTMENT RESEARCH,
INC., an Illinois corporation;
17 NATIONAL MARKETING
RESOURCES, LLC, a Missouri limited
18 liability company; PARADIGM
DIRECT LLC, a Delaware limited
19 liability company; RESPONSE
NORTH, LLC, a Utah limited liability
20 company; ZACKS INVESTMENT
MANAGEMENT, INC., an Illinois
21 corporation; and DOES 6-50, inclusive,

22 Defendants.
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CASE NO. 16-CV-01352 GPC BLM

**NOTICE OF MOTION AND
MOTION FOR AWARD OF
ATTORNEYS' FEES, LITIGATION
EXPENSES, AND CLASS
REPRESENTATIVE
ENHANCEMENTS**

Date: April 6, 2018

Time: 1:30 p.m.

Crtrm.: 2D (2nd Floor - Schwartz)

Judge: Hon. Gonzalo P. Curiel

1 TO ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD:

2 PLEASE TAKE NOTICE that on April 6, 2018, at 1:30 p.m. in Courtroom
3 2D of the above-captioned Court located at 221 West Broadway, San Diego,
4 California 92101, the Honorable Gonzalo P. Curiel presiding, plaintiffs John Kerr,
5 Edward Li, Tim Barnard, Kenneth Curtis, Lia Johnson, John Abjanic, and Arnold
6 Cares will and hereby do move the Court for an award of attorneys' fees,
7 reimbursement of litigation expenses, and an award of class representative
8 enhancements.

9 The motion for an award of attorneys' fees and litigation expenses is made on
10 the ground that the requested attorneys' fees represent reasonable compensation to
11 Class Counsel for their representation of the class, including recovery of the
12 common fund, and the litigation expenses were actually and reasonably incurred for
13 the benefit of the class. The motion for an award of enhancement payments to the
14 named plaintiffs is made on the ground that such payments represent fair
15 compensation for the efforts and risk undertaken for the benefit of the class.

16 This motion is based on this Notice, the Memorandum of Points and
17 Authorities filed herewith, the Declaration of Zach P. Dostart filed herewith, the
18 court record in this action, and any argument or evidence as the Court may consider
19 at the hearing of this motion.

20 Dated: February 8, 2018

DOSTART HANNINK & COVENEY LLP

21
22 s/ Zach P. Dostart

23 ZACH P. DOSTART

24 Attorneys for Plaintiffs

Email: zdostart@sdlaw.com

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